

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

In re:

TASHANNA GOLDEN

Debtor

Case No. 16-40809 (ESS)

Chapter 7

**DEBTOR'S NOTICE OF MOTION TO REOPEN CHAPTER 7 CASE**

PLEASE TAKE NOTICE that upon the annexed affirmation, Tashanna Golden (“Debtor” or “Golden”) by and through the undersigned counsel, will move this Court on March 24, 2020 at 2:30 p.m. or as soon thereafter as counsel may be heard, at the United States Bankruptcy Court for the Eastern District of New York, 271-C Cadman Plaza East, Brooklyn, New York 11201, Courtroom 3585, before the Honorable Elizabeth S. Stong, for an Order:

- a) Reopening the Debtor’s Chapter 7 case pursuant to 11 U.S.C. § 350(b) of the Bankruptcy Code and Rules 5010 and 4007 of the Federal Rules of Bankruptcy Procedure, for the purpose of seeking:
  - i. Declaratory relief that Golden’s private student loans issued by Discover Bank (the “Debts”) were discharged by operation of law on August 3, 2016 because they are not educational debts excepted from discharge by Section 523(a)(8);
  - ii. And award of actual damages and sanctions for violations of the discharge injunction;
  - iii. An award of a reasonable attorneys’ fees;
  - iv. Restitution of all funds paid on said Debts since August 3, 2006; and
  - v. Other just relief that this Court deems proper.

Dated: February 14, 2020

Respectfully submitted,

**BOIES SCHILLER FLEXNER LLP**

/s/ George F. Carpinello

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